

JAP:MTK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

16 M 0455

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. § 952(a) and 960)

TOVA OCYTHINA LEVY,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

ROSANNA LICITRA, being duly sworn, deposes and states that she is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

On or about May 15, 2016, within the Eastern District of New York and elsewhere, the defendant TOVA OCYTHINA LEVY did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent’s information and belief are as follows:¹

1. On or about May 15, 2016, the defendant TOVA OCYTHINA LEVY arrived at JFK International Airport in Queens, New York aboard Caribbean Airlines flight BW 17 from Kingston, Jamaica.

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.


2. Upon her arrival, the defendant was selected for an enforcement examination by United States Customs and Border Protection ("CBP") officers. The defendant presented two carry-on bags. The defendant claimed ownership over both bags and stated that all of the contents of the bags belonged to her.

3. During the examination of the defendant's baggage, CBP officers discovered four cans of Lasco instant chocolate mix. A CBP officer cut open one of the cans, which contained a white powdery substance. This substance field tested positive for the presence of cocaine.

4. The total approximate gross weight of the cocaine recovered from the defendant's belongings was 1,886 grams.

WHEREFORE, your deponent respectfully requests that the defendant TOVA OCYTHINA LEVY be dealt with according to law.

Dated: Brooklyn, New York
May 16, 2016


ROSANNA LICITRA
Special Agent
United States Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
16th day of May, 2016


THE HONORABLE PEGGY KUO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK